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April 21, 2006

Ms. Jodi Winship
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Re: All America PAC
FEC ID No. C00344788

Dear Ms. Winship:

This is in response to your letter dated March 24, 2006 concerning the Year End Report (7/1/05-12/31/05) of the above referenced Committee.

You ask about expenditures for "Catering," "Catering & Room Rental" and "Fundraising Consulting Services" made by All America PAC (the "Committee"). These expenditures were for the Committee's own activities and were not made on behalf of any specifically identified federal candidate.

You also ask about expenditures for "Communications Consulting & Expenses" and "Printing." The expenditures you cite were made to conduct the Committee's own general activities and programs and did not contain express advocacy or mention federal candidates.

We hope that this information adequately addresses your questions. If you need any further information, please do not hesitate to contact the Committee.

Very truly yours,

Robert F. Bauer
Counsel to All America PAC
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